

Exhibit E

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<p>1 because I was unable to find them.</p> <p>2 A. I -- I can't imagine. The only times</p> <p>3 I'd ever deleted a tweet were if I misspelled</p> <p>4 something that I deleted it to put another tweet</p> <p>5 up.</p> <p>6 Q. So you didn't delete anything that was</p> <p>7 responsive to this lawsuit being filed.</p> <p>8 A. No.</p> <p>9 Q. Okay. How many followers do you have on</p> <p>10 Twitter?</p> <p>11 A. Right now?</p> <p>12 Q. Yes, sir.</p> <p>13 A. More than 25,000. I don't know how many</p> <p>14 I have.</p> <p>15 Q. What did you have back in 2022?</p> <p>16 A. I have no idea.</p> <p>17 Q. Think. I mean guess. I'm not asking</p> <p>18 you for particular number, but did you have 5,000,</p> <p>19 50,000?</p> <p>20 A. I don't think I've ever had 50,000. I</p> <p>21 would guess that I had more than 5,000, and you</p> <p>22 said 2022?</p> <p>23 Q. Yes, sir.</p> <p>24 A. Okay. I -- so I'll just tell you. I</p> <p>25 started blogging in 2006, and looking to see how</p> <p style="text-align: right;">Page 138</p>	<p>1 MR. PIETSCH: Can we take just a short</p> <p>2 break --</p> <p>3 MS. RILEY: Certainly.</p> <p>4 MR. PIETSCH: -- before that because I</p> <p>5 assume this will be a section.</p> <p>6 MS. RILEY: Yes.</p> <p>7 VIDEOGRAPHER: Off the record at</p> <p>8 11:30 a.m.</p> <p>9 (Recess held.)</p> <p>10 VIDEOGRAPHER: We are back on the record</p> <p>11 at 11:37 a.m.</p> <p>12 BY MS. RILEY:</p> <p>13 Q. Pastor Barber, I'm going to hand you a</p> <p>14 document, and if you will tell me what that is</p> <p>15 after he marks it.</p> <p>16 (Deposition Exhibit 9 marked.)</p> <p>17 MS. MADDUX: What's the Bates No,</p> <p>18 Katherine?</p> <p>19 MS. RILEY: 176182 LYELL.</p> <p>20 BY MS. RILEY:</p> <p>21 Q. Are you finished reading it?</p> <p>22 A. Oh.</p> <p>23 Q. Yeah. I need you just to be able to</p> <p>24 tell me what it is.</p> <p>25 A. Okay.</p> <p style="text-align: right;">Page 140</p>
<p>1 many people had read something that I wrote was bad</p> <p>2 for me. I liked to see that a lot of people read</p> <p>3 what I wrote, and I stopped looking at things like</p> <p>4 that because --</p> <p>5 Q. Is it fair to say you --</p> <p>6 A. -- it would be prideful.</p> <p>7 Q. -- you had anything between 5 and 25,000</p> <p>8 back in 2022?</p> <p>9 A. Yeah. I would say that's probably</p> <p>10 right.</p> <p>11 Q. Okay.</p> <p>12 A. I mean --</p> <p>13 THE REPORTER: Slow down, everybody.</p> <p>14 THE WITNESS: I'm so sorry. I'm so</p> <p>15 sorry.</p> <p>16 A. I would guess that I had around 20,000</p> <p>17 maybe.</p> <p>18 BY MS. RILEY:</p> <p>19 Q. I'm not trying to hold you. I'm just</p> <p>20 trying to see if --</p> <p>21 A. I --</p> <p>22 Q. -- you have a general idea of how many</p> <p>23 followers you had.</p> <p>24 Okay. Now let's get into your tweets.</p> <p>25 A. Okay.</p> <p style="text-align: right;">Page 139</p>	<p>1 Q. Just if you'll identify it for me.</p> <p>2 A. Sure.</p> <p>3 Q. And then I'll ask you questions.</p> <p>4 A. Sure. So this appears to come from</p> <p>5 Twitter. It's a series of tweets from Tom Buck.</p> <p>6 The first one quotes a tweet from me on June 7th of</p> <p>7 some year.</p> <p>8 Q. Okay. And your quote says, I believe</p> <p>9 that God hears the cry of sex abuse victims; is</p> <p>10 that correct?</p> <p>11 A. Yes.</p> <p>12 Q. And you stated that.</p> <p>13 A. Yes.</p> <p>14 Q. And above that, it appears that Tom Buck</p> <p>15 says, It's also true that God hears the cries of</p> <p>16 the falsely accused. I've stood by some who were</p> <p>17 victims of false accusation.</p> <p>18 Did I read that correctly?</p> <p>19 A. Yes.</p> <p>20 Q. And is that a fair representation of</p> <p>21 what was said between you and Pastor Buck?</p> <p>22 A. Yes.</p> <p>23 Q. Do you agree with Tom Buck's statement</p> <p>24 that God also hears the cry of falsely accused?</p> <p>25 A. Yes.</p> <p style="text-align: right;">Page 141</p>

<p>1 Q. And have you ever considered that this 2 lawsuit is God's answer to David Sills' cries that 3 he was falsely accused of sexual abuse? 4 MR. PIETSCH: Object to the form. 5 A. You're asking me if I've ever thought 6 that -- 7 BY MS. RILEY: 8 Q. Uh-huh. 9 A. -- about this lawsuit? No. 10 Q. Should you? 11 MR. PIETSCH: Object to the form. 12 A. No. 13 BY MS. RILEY: 14 Q. Okay. You ever prayed about that? 15 MR. PIETSCH: Object to the form. 16 A. Have I -- 17 MR. PIETSCH: I'm not even sure -- I 18 don't know that I can instruct him not to answer, 19 but if you're asking him what he's prayed about, I 20 don't know that that's -- I'm not instructing him 21 not to answer, but I'd ask that we get to questions 22 that are relevant. 23 You can answer if you want to. 24 A. You're asking me if I prayed about 25 something that two questions ago I said I had not</p> <p style="text-align: right;">Page 142</p>	<p>1 Q. Okay. 2 MR. PIETSCH: No. She's asking about 3 your prayers is what she's asking -- 4 MS. RILEY: No. I understand 5 what you're saying though so we'll -- 6 THE REPORTER: You guys are talking too 7 fast. 8 BY MS. RILEY: 9 Q. I understand what you're saying, and I 10 will -- we'll come back to it. 11 A. Okay. 12 Q. All right. The next document is 13 LYELL_00348617. 14 (Deposition Exhibit 10 marked.) 15 A. Okay. 16 BY MS. RILEY: 17 Q. And I'll represent I put these together 18 myself from what appears to be your thread. 19 A. Uh-huh. 20 Q. And so they will all have Bates -- 21 different Bates numbers, so I just -- while you're 22 looking at it, I'm going to call out the Bates 23 numbers, so you can ignore me. 24 A. Very good. 25 Q. All right. So the first page is the</p> <p style="text-align: right;">Page 144</p>
<p>1 thought about, and -- 2 BY MS. RILEY: 3 Q. No. I'm asking you have you ever prayed 4 about whether or not you were correct in your 5 accusations that Jennifer Lyell's allegations were 6 true? 7 MR. PIETSCH: Object to the form. That 8 wasn't the question that you asked him before. 9 MS. RILEY: That's what I'm asking him 10 now. 11 MR. PIETSCH: I'm going to -- can I just 12 repeat my -- or -- 13 MS. RILEY: You don't have to repeat it. 14 MR. PIETSCH: -- incorporate by 15 reference my prior objection? 16 MS. RILEY: Yes. 17 MR. PIETSCH: You can answer if you 18 choose. 19 A. If you have specific wording for me that 20 you would like for me to respond to, I'll be happy 21 to take a look at it, but right now, you're asking 22 me about statements that you're alleging that I 23 made that I'm not -- that haven't been put into 24 evidence at this point. 25 BY MS. RILEY:</p> <p style="text-align: right;">Page 143</p>	<p>1 number I just called out that ends in 617. The 2 next one is LYELL_00349031. The next one is 3 LYELL_00349570. The next one is 00348748, and the 4 last one is LYELL_00348466. 5 (Witness reviews document.) 6 A. Okay. 7 BY MS. RILEY: 8 Q. Okay. Can you tell me what that 9 document is that I've just handed you? 10 A. It's a multipage document that presents 11 a thread of tweets that I posted on Twitter along 12 with some people's replies. 13 Q. So you don't dispute that these were 14 screenshotted or taken from your email thread -- I 15 mean your tweet thread? 16 A. I'll stipulate that I wrote all of this. 17 Q. Okay. All right. And on the first one 18 on the first page, it shows that an @JenLyell was 19 tagged? 20 A. Yes. Yes, that I'm replying to -- I'm 21 replying to a tweet that mentioned her. 22 Q. Okay. 23 A. And that mentioned me. 24 Q. So that means that all of her followers 25 saw your response; is that correct?</p> <p style="text-align: right;">Page 145</p>